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May 8, 2019

VIA ECF  
Honorable Deborah K. Chasanow  
United States District Court  
6500 Cherrywood Lane  
Greenbelt, Maryland 20770

Re: United States vs. Rona Zhfani  
Case No. DKC 18-0370

Dear Judge Chasanow:

The above captioned matter is presently scheduled for sentencing before the Court on May 23, 2019. Objections to the Presentence Report and Sentencing Memoranda are due on May 9, 2019

I write this letter with the consent of Assistant United States Attorney Harry Gruber to request that the Court reschedule the sentencing hearing in this matter and enlarge, for at least two weeks, the date by which objection to the PSR are due and by which sentencing memoranda are due.

As the Court is aware the PSR in this matter was delayed in its receipt by counsel due a death in the family the United States Probation Officer Nikki Martin. The PSR was received last Thursday. Additionally, undersigned counsel has just recently received materials from Ms. Zhfani that undersigned counsel believes will be significant in addressing 3553(a) factors as mitigating information on behalf of Ms. Zhfani. Additional materials are expected to be received from Ms. Zhfani in the near future. For these reasons, and primarily for the reasons relating to the receipt and use of potential 3553(a) materials and information, I am requesting that the sentencing hearing be continued and that the Court enlarge by at least two weeks the date for the filing of sentencing memoranda.

A postponement will ensure that all relevant materials are presented to the Court and provided to the government sufficiently in advance of the sentencing hearing in this matter for all to have an opportunity to review such materials.

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The Court's consideration of this request to reschedule the sentencing hearing in this matter and to enlarge the time for filing of sentencing memoranda is most appreciated.

Sincerely,

*/s/ Robert C. Bonsib*

Robert C. Bonsib

RCB/anm

cc: Assistant United States Attorneys Harry Gruber and P. Michael Cunningham (via ECF)  
United State Probation Officer Nikki Martin (via email)